Message

From: Hicks, Matt [Hicks.Matthew@epa.gov]

Sent: 12/17/2019 6:30:51 PM

To: Palmer, Leif [Palmer.Leif@epa.gov]

CC: Ghosh, Mita [Ghosh.Mita@epa.gov]; Nagrani, Kavita [Nagrani.Kavita@epa.gov]

Subject: FW: Revised criminal intent paper
Attachments: FL Ex. 5 AC/DP 12.4.19.docx

Leif,

For tomorrow's call with David Fotouhi, here's the final draft of the Ex. 5 AC/DP paper, as revised by Simma at Steve Neugeboren's direction.

Thanks,

Matt

From: Kupchan, Simma < Kupchan. Simma@epa.gov>

Sent: Thursday, December 5, 2019 4:38 PM

To: Wehling, Carrie < Wehling. Carrie@epa.gov>; Hicks, Matt < Hicks. Matthew@epa.gov>; Nagrani, Kavita

<Nagrani.Kavita@epa.gov>; Hurld, Kathy <Hurld.Kathy@epa.gov>

Subject: Revised Ex. 5 AC/DP paper

Hi all,

I have edited the Ex. 5 AC/DP paper per direction from Steve Neugeboren to streamline and reorganize a bit, and clarify the grounds for some of our objections, in preparation for briefing politicals. Please let me know if you have edits, and then I'll send to the larger group. If you think that my statutory interpretation analogy is silly, I welcome alternative formulations!

Simma Kupchan EPA Office of General Counsel Water Law Office WJC North Building # 7426Q 202-564-3105